

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**DECLARATION OF MICHAEL D. BLATCHLEY IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS CERTIFICATION AND
APPOINTMENT OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

I, Michael D. Blatchley, declare:

1. I am a partner at the law firm of Bernstein Litowitz Berger & Grossmann LLP ("Bernstein Litowitz"), and together with Stoll Berne Lokting & Shlachter P.C. ("Stoll Berne"), serve as Lead Counsel for the proposed Class in this action. I have personal knowledge of the facts set forth herein and, if called as a witness, could and would testify competently thereto. I submit this declaration in support of Plaintiffs' Motion for Class Certification and Appointment of Class Representatives and Class Counsel.

2. In this matter, Bernstein Litowitz and Stoll Berne have, among other things, investigated and filed an amended complaint, successfully opposed Defendants' motion to dismiss, retained and consulted with numerous experts, and conducted significant discovery.

3. I am unaware of any litigation already begun by or against Class Members.

4. Bernstein Litowitz has extensive experience handling large-scale securities fraud and class action litigation. A copy of our current firm resume detailing our experience in these areas is attached hereto as Exhibit A.

5. Stoll Berne also has extensive experience handling large-scale securities fraud and class action litigation. A copy of Stoll Berne's current firm resume detailing its experience in these areas is attached hereto as Exhibit B.

6. Attached hereto as Exhibit C is a true and correct copy of the Expert Report of Michael L. Hartzmark, Ph.D, dated January 21, 2020.

7. Attached hereto as Exhibit D is a true and correct copy of the Declaration of Brian De Haan, dated January 21, 2020.

8. Attached hereto as Exhibit E is a true and correct copy of the Declaration of Fernando Alberto Vildosola, dated January 21, 2020.

I certify under penalty of perjury under the laws of the United States that the foregoing is true and correct.

DATED this 21st day of January, 2020.

**BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP**

By: /s/ Michael D. Blatchley

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